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**Cc:** [MCCLINCY Matt](#); [PETERSON Jenn L](#); [POULSEN Mike](#); [GAINER Tom](#)  
**Subject:** Initial Concerns with RD2 SCSR  
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Eric & Chip,  
Here are my initial concerns with the RD2 SCSR.

1) How was the SLRA completed (taking COIs to COPCs)? What methods did the LWG use to determine "site-wide sediment concentrations to identify iAOPCs"? Are these "site-wide concentrations" upper-bound or UCL of the mean? If so, are we potentially missing chemicals that occur infrequently, but when they do..., they occur at very high concentrations? I think Jennifer P probably has the same concern that she can better articulate.

2) The RD 2 SLRA & development of iAOPCs were based on COI-by-COI comparison to iPRGs or other methods (e.g., bioassays). However, SLRAs should consider 3 comparisons:

- Individual- COI-by-COI. This is the concept of hazard quotients (HQs).
- Cumulative multiple COIs in 1 given medium (additive). This is the concept of hazard indexes (HIs).
- Aggregate- simultaneous exposure to individual or multiple COIs within different media (e.g. HIs summed from sediment HQ & TZW HQ).

I think this is probably more of an ERA concern than a human risk assessment concern.

3) The concern Matt sent you earlier regarding replacement values in the hill topping procedures.

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